

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: CHRISTINA R. THOMAS,	:	Chapter 13
Debtor	:	
	:	
HARLEY-DAVIDSON CREDIT	:	
CORP.	:	Case No. 20-00821
Movant	:	
	:	
Vs.	:	
	:	
CHRISTINA R. THOMAS,	:	
DAVID E. THOMAS, AND	:	
CHARLES J. DEHART, III	:	
	:	
Respondents	:	

**ANSWER OF DEBTOR TO HARLEY-DAVIDSON CREDIT CORP'S MOTION
FOR RELIEF FROM STAY & CO-DEBTOR STAY**

AND NOW comes your Debtor, Christina R. Thomas, by and through her counsel, Aaron J. Neuharth, Esquire and Answers Movant's Motion For Relief From Automatic Stay as follows:

1. Admitted.
2. Admitted in part. Denied in part. It is admitted that David E. Thomas, Jr. is a Non-Filing Co-Debtor. It is denied that he resides at 6235 Hager Road, Greencastle, PA 17225.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. (12) Admitted. By way of further answer, the Debtor desires to bring the payments current.
12. (13) Neither admitted nor denied that Movant is seeking relief from the Co-debtor stay. By way of further answer, David E. Thomas, Jr. received a Chapter 7 bankruptcy discharge of the financial obligation under case number 20-00864 on June 22, 2020.

Wherefore, Respondent respectfully requests this Honorable Court deny Movant's Motion based upon Debtor's proof that payments have been submitted to Movant that Debtors have not received credit for.

Date: September 14, 2020

/s/ Aaron J. Neuharth
Aaron J. Neuharth
Attorney for Debtor
Supreme Ct. No.: 88625
PO Box 359
Chambersburg, PA 17201
(717)264-2939